

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE EXPORT-IMPORT BANK OF :
THE REPUBLIC OF CHINA, : Civil Action No. 13-cv-1450 (HB)
Plaintiff/Judgment Creditor, :
-against- :
GRENADA, :
Defendant/Judgment Debtor. :
GMO TRUST, on behalf of its series GMO EMERGING :
COUNTRY DEBT FUND, GMO EMERGING COUNTRY :
DEBT L.P., GMO EMERGING COUNTRY DEBT :
INVESTMENT FUND PLC, GREYLOCK GLOBAL :
OPPORTUNITY MASTER FUND LTD., and FRANKLIN :
TEMPLETON EMERGING MARKET DEBT :
OPPORTUNITIES FUND PLC, :
Intervenors/Defendants. :
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**NOTICE OF MOTION OF THE EXPORT-IMPORT BANK OF THE REPUBLIC OF
CHINA TO COMPEL GRENADA'S RESPONSE TO PLAINTIFF'S FIRST SET OF
DOCUMENT REQUESTS TO DEFENDANT**

PLEASE TAKE NOTICE that upon the Declaration of Paul E. Summit, dated June 4, 2014, and the exhibits attached thereto, the accompanying Memorandum of Law, and all prior pleadings and papers filed in this action, Plaintiff The Export-Import Bank of the Republic of China ("Ex-Im Bank") will move this Court for an Order, pursuant to Rules 26, 34, and 37 of the Federal Rules of Civil Procedure, compelling Defendant Grenada to produce all documents responsive to Plaintiff's First Set of Document Requests to Defendant, dated April 23, 2013, and

to pay the expenses and reasonable attorneys' fees incurred by Ex-Im Bank in making this motion.

Dated: New York, New York
June 4, 2014

SULLIVAN & WORCESTER LLP

By: /s/ Paul E. Summit
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